



1639 -11th Street • Suite 152, Santa Monica, CA 90405 • 1-800-783-3128

June 7, 2012

Before the Federal Communications Commission Washington, DC 20554

In the Matter of }
Interpretation of the Terms “Multichannel }
Video Programming Distributor” and } MB Docket No. 12-83 “Channel” As
Raised in Pending Program }
Access Complaint Proceeding }

REPLY COMMENTS OF THE DIGITAL DEVELOPMENT GROUP

As early adopters of “OTT” hardware service providers (such as the Boxee, Google TV, Apple TV, Western Digital), the founders of our company, The Digital Development Group, have spent many years and significant financial resources developing applications that help content providers meet ever-changing consumer demands for information and entertainment programming.

Although Google’s recent acquisition of Motorola mobility has been touted by Google as an “arms length transaction” and a “decision” not to enter the hardware business, this cannot be ignored. They are, in fact, now an owner of a HARDWARE company providing DVR’s, and Google’s integrating GOOGLE TV within a Motorola box would be a foolish thing NOT to do. Otherwise, what is the point of just protecting the vast amount of patents? Android is GOOGLE TV’s operating system.

How can such a large deal get by the FCC potential ruling and force other companies, such as the device companies mentioned above, to force encryption?

As Mr. De Ventura, Sr., stated clearly in his comments to you:

“It has always been the policy of our government that the broadcast channels are meant to be freely available over the air and by other means. There is no reason to change this policy now just because the cable companies want every home and apartment to have one of their set-top boxes and a paying subscription from them. I hope you will not allow them to encrypt these signals.”

Please consider how the ruling will affect the overall landscape, creativity and hard working creators of content who do not have large production budgets and who have a VOICE to be heard.

We appreciate your consideration and review of our comments.

Respectfully,

The Digital Development Group

Joe Q. Bretz

President

www.digidev.com

cc: Law Offices of David R. Altshuler, Esq.